

# **Exhibit B**

**Orr, Jason A.**

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**From:** Lazatin, Carlos M.  
**Sent:** Monday, September 13, 2021 1:51 PM  
**To:** Manny Starr; Pao, William K.; Orr, Jason A.  
**Cc:** Ari Basser; Karo Karapetyan; Chris Marlborough; Adam Rose  
**Subject:** RE: Gevorkyan v. Bitmain - Briefing, amended complaint

Sure.

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**From:** Manny Starr <manny@frontierlawcenter.com>  
**Sent:** Monday, September 13, 2021 1:47 PM  
**To:** Lazatin, Carlos M. <clazatin@omm.com>; Pao, William K. <wpao@omm.com>; Orr, Jason A. <jorr@omm.com>  
**Cc:** Ari Basser <abasser@pomlaw.com>; Karo Karapetyan <karo@frontierlawcenter.com>; Chris Marlborough <chris@marlboroughlawfirm.com>; Adam Rose <adam@frontierlawcenter.com>  
**Subject:** Re: Gevorkyan v. Bitmain - Briefing, amended complaint

[EXTERNAL MESSAGE]

Hi Carlos,

How about tomorrow at 1 pm?

Thanks

**Manny Starr**

*Managing Partner*

Tel: (818) 914-3433

Direct: (818) 924-4260

Fax: (818) 914-3433

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**From:** Lazatin, Carlos M. <[clazatin@omm.com](mailto:clazatin@omm.com)>  
**Sent:** Monday, September 13, 2021 1:40 PM  
**To:** Manny Starr <[manny@frontierlawcenter.com](mailto:manny@frontierlawcenter.com)>; Pao, William K. <[wpao@omm.com](mailto:wpao@omm.com)>; Orr, Jason A. <[jorr@omm.com](mailto:jorr@omm.com)>  
**Cc:** Ari Bassar <[abassar@pomlaw.com](mailto:abassar@pomlaw.com)>; Karo Karapetyan <[karo@frontierlawcenter.com](mailto:karo@frontierlawcenter.com)>; Chris Marlborough <[chris@marlboroughlawfirm.com](mailto:chris@marlboroughlawfirm.com)>; Adam Rose <[adam@frontierlawcenter.com](mailto:adam@frontierlawcenter.com)>  
**Subject:** RE: Gevorkyan v. Bitmain - Briefing, amended complaint

Hi Manny,

It probably makes sense for us to get on a call sooner rather than later if you are planning on amending. Let us know if you're available at some point tomorrow. Thanks.

Carlos

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**From:** Manny Starr <[manny@frontierlawcenter.com](mailto:manny@frontierlawcenter.com)>  
**Sent:** Friday, September 10, 2021 3:47 PM  
**To:** Lazatin, Carlos M. <[clazatin@omm.com](mailto:clazatin@omm.com)>; Pao, William K. <[wpao@omm.com](mailto:wpao@omm.com)>  
**Cc:** Ari Bassar <[abassar@pomlaw.com](mailto:abassar@pomlaw.com)>; Karo Karapetyan <[karo@frontierlawcenter.com](mailto:karo@frontierlawcenter.com)>; Chris Marlborough <[chris@marlboroughlawfirm.com](mailto:chris@marlboroughlawfirm.com)>; Adam Rose <[adam@frontierlawcenter.com](mailto:adam@frontierlawcenter.com)>  
**Subject:** Gevorkyan v. Bitmain - Briefing, amended complaint

[EXTERNAL MESSAGE]

Hi Carlos,

I hope that you had a safe flight back after last week's deposition. Now that the deposition has been completed, it is our understanding that the deadline to file simultaneous briefs is Friday, October 1st. It is our further understanding that, while the Judge did not specify a page limit for the supplemental briefs, they are still subject to the same 10-page limit as the original briefs on jurisdictional discovery filed earlier in this matter. Please let us know if you have a different understanding, or confirm you'll proceed pursuant to a 10-page limit.

Please be advised that we intend to amend the Complaint to add Beijing Bitmain Technologies as an additional defendant, based in part on facts which were discovered during the deposition. Please let me know whether

Bitmain HK will consent to the amendment. If not, we would like to schedule a call with you sometime towards the end of next week to meet and confer regarding our contemplated motion to amend.

Thanks

**Manny Starr**

*Managing Partner*

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